

JUL 02 2003 14:30 FR BANK OF AMERICA OP 954 928 1454 TO 914105760544 P.02/02

Bank of America.



Bank of America
Subpoena Unit
FL6-001-02-12
PO Box 407090
Fort Lauderdale, FL 33340-7090

VIA FACSIMILE
AND FEDERAL EXPRESS

July 2, 2003

Howard J. Schulman, Esquire
Schulman & Kaufman, LLC
One Charles Center
100 N. Charles Street, Suite 600
Baltimore, Maryland 21201

Re: Wyndholme Village, LLC, et al. v. NADIF of Wyndholme, LLC, et al.
Case No. L01-3809
Subpoena

Dear Mr. Schulman:

Pursuant to Fed. R.Civ. P. 45(c)(2)(B), Bank of America, N.A. is hereby submitting to you its written objection to the subpoena directed to and served on Bank of America relating to the above-referenced case.

Bank of America is in receipt of a Motion to Quash filed on behalf of NADIF of Wyndholme, LLC, WVI, LLC, John R. "Jack" Quinn and Howard "Rusty" Zukerman. Pursuant to Rule 45(c)(2)(B) and Fla. Statute §655.059(e), please be advised that Bank of America will not produce the documents responsive to the subpoena unless and until a court order is issued requiring production of the documents. In addition Bank of America will require reimbursement for its costs of producing the documents.

Very truly yours,


Yolanda Guerra

cc: William C. Sammons, Esquire



Revised Page: